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5 IN THE UNITED STATES DISTRICT COURT  
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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8 IN RE: UBER TECHNOLOGIES, INC.,  
9 PASSENGER SEXUAL ASSAULT  
10 LITIGATION

Case No. 23-md-03084-CRB

11 This Document Relates to:  
12 ALL CASES  
13

**DECLARATION OF TIFFANY ELLIS IN  
SUPPORT OF PLAINTIFFS' BRIEF  
REGARDING DISPUTED ENTRIES FOR  
SPECIAL MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in  
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing  
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' Brief Regarding Disputed Entries  
6 for Special Master Review.

7 **Exhibits**

8 3. Attached as **Exhibit 1** is a true and correct copy of the transcript of the October  
9 23, 2024 discovery hearing.

10 4. Attached as **Exhibit 2** is a true and correct copy of Plaintiffs' Privilege Challenge  
11 Chart.

12 5. Attached as **Exhibit 3** is a true and correct copy of a letter that was filed on and  
13 pulled from the docket at ECF No. 2401-1 in *Waymo LLC v. Uber Techs., Inc.*, Case No. 3:17-cv-  
14 00939-WHA (Dec. 15, 2017).

15  
16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct.

18 Executed this 4<sup>th</sup> day of March, 2025 in Detroit, Michigan.

19  
20 /s/ Tiffany R. Ellis  
Tiffany R. Ellis